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Approved by: *[Signature]*

DAVID PRESLEY

Special Assistant United States Attorney

Before: THE HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA : MISDEMEANOR
: COMPLAINT
:
-v- : Violation of
:
GEORGE E. ALAKPA : NY PL 265.01(1)
:
Defendant : COUNTY OF OFFENSE:
: DUTCHESS
:
-----x
SOUTHERN DISTRICT OF NEW YORK, ss.:

ANTHONY LUCIANO, being duly sworn, deposes and says that he is a Police Officer, assigned to the Department of Veterans Affairs Police Service, Castle Point Veterans Administration Hospital, Wappinger Falls, New York, which is located in the Southern District of New York, and charges as follows:

COUNT ONE

On or about November 23, 2018, at the Veteran's Administration Hospital-Castle Point, Wappinger Falls, New York, within the special maritime and territorial jurisdiction of the United States, in the Southern District of New York, GEORGE E. ALAKPA, the defendant, unlawfully, knowingly and willfully possessed a any firearm, electronic dart gun, electronic stun gun, or any other dangerous or deadly weapon, instrument or weapon, to-wit, the defendant possessed an electric stun gun.

(New York Penal Law, Section 265.01(1))

The basis for the deponent's knowledge and for the foregoing charges are, in part, as follows:

1. I am a Police Officer, assigned to the Department of Veterans Affairs Police Service, Castle Point Veterans Administration Hospital, Wappingers Falls, New York, which is located in the Southern District of New York.

2. On or about November 21, 2018, at approximately 3:39 p.m., VA Police received a call from HAS supervisor, Jessica McGinley indicating that an employee assigned to HAS made a threat to shoot up the VA. McGinley stated that MSA employee Jessica Rodriquez stated that while she was working in the CpH Specialties Clinic when she and other employees, to include the defendant, were discussing world news and such and the topic of guns and shootings came up. The defendant then started talking about his frustrations with the VA and that he would shoot up the place. Rodriquez and the other employees became concerned and notified the supervisor, Jessica McGinley.

3. VA Officer Craig Wood interview Rodriquez who indicated that on November 20, 2018, around 3:00 p.m., she and her coworkers were discussing world events and jobs at the VA. Rodriquez said that the defendant was asked what he was going to do when he left the VA. Rodriquez stated that the defendant became agitated when answering the question. She stated that the defendant said that being a veteran and now having the experience as a MSA was so frustrating that it got you to the point that you want to shoot up the place. Rodriquez said she told him he couldn't say things like that around there and changed the subject because it became awkward. Rodriquez said this was not the first time the defendant has made statements like these.

3. VA Officer Wood then interviewed witness Shelly Schlenker who stated on the previous day she had heard the defendant say "shoot up the place" while they were having a conversation with Rodriquez. Schlenker stated she turned to the defendant and attempted to make light of the situation to alleviate the awkwardness of the situation. Schlenker stated that there have been several other occasions where she had to defuse situations in which the defendant became agitated at either veterans or some coworkers.

4. All witness provided written statements about the incident.

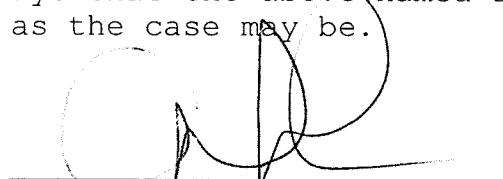
5. On November 23, 2018 at approximately 07:50 a.m., SGT Tabone and Officer Wood were monitoring incoming vehicles for the arrival of the defendant. The defendant's vehicle was stopped at Post 7 of Castle Point VA property and Officer Wood approached his vehicle and asked the defendant to park the car. The defendant asked why and was informed it was for safety reasons. The defendant complied and stepped out of the vehicle. The defendant was asked if he had any weapons and he stated no. The defendant was patted

down for weapons which met with negative results. Officer Wood informed the defendant that there had been a report that in conversation he had with employees, he stated something about shooting the place up. The defendant denied saying anything like that. Officer Wood searched the defendant's vehicle and in the driver's side door pocket, he observed a black object which turned out to be a stun gun. The defendant stated he bought it from Amazon and had it delivered to his residence in New Jersey and that he did not know it was illegal. A search of the entire vehicle netted no other weapons.

6. The defendant was taken to the police station for processing. He was advised of his rights which he waived and provided a written statement in which he admitted that he carried the stun gun for personal protection after he was denied a conceal carry permit by the New Jersey Sussex Court. The defendant indicated he carried it for his protection after he received numerous harassment he had been exposed to after returning from combat. The defendant stated he only started carrying it in his car following numerous harassment by same individuals in certain areas of New Jersey following the 2015-2016 elections and the "TRUMP" sticker on his vehicle and he felt it was the only means to protect himself.

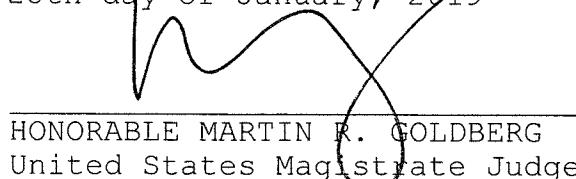
7. The defendant was issued a District Court Violation Notice for Criminal Possession of a Weapon in the Fourth Degree (DCVN number 6437751/SY53 and was released on his own recognizance.

WHEREFORE, deponent prays that the above-named defendant be imprisoned or bailed, as the case may be.



ANTHONY LUCIANO
VA Police Service

Sworn to before me this
25th day of January, 2019



HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York